

Notice of Removal

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF INDIANA**

MARGARET TUCKER,)	
)	
Plaintiff,)	
v.)	Case No. 2:21-cv-387
)	
ILLINOIS CENTRAL RAILROAD CO.;)	
ILLIANA CENTRAL RAILROAD; and)	
CANADIAN NATIONAL RAILWAY,)	
)	
Defendants.)	

DECLARATION OF JOHN FURLAN

I, John Furlan declare under penalty of perjury that the following is true and correct based upon my personal knowledge:

1. I am an attorney licensed by and practicing in Illinois. The facts stated in this declaration are based upon my personal knowledge and review of pertinent corporate records.

2. I currently serve as in-house counsel for the United States operating railroad subsidiaries of Canadian National Railway Company (“CNR”), including Illinois Central Railroad Company (“ICRR”). I have served in this position since October 2008. My duties include overseeing maintenance of the corporate records of ICRR. I am familiar with those records and the corporate structure of ICRR and CNR.

3. CNR is a Canadian corporation with its principal place of business in Montreal, Quebec, Canada.

4. ICRR is an Illinois corporation with its principal place of business in Homewood, Illinois.

5. I am not familiar with any railroad or company named “Illiana Central Railroad”.

6. “Illiana Central Railroad” is not a subsidiary or affiliate of CNR or ICRR.

Pursuant to 28 U.S.C. 1746(2), I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on December 16, 2021

By: _____